

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

**IN RE:** §  
§ **Bankruptcy Case No. 25-30155**  
**ALLIANCE FARM AND RANCH, LLC** §

**CREDITOR DUSTIN ETTER'S RESPONSE TO  
DEBTOR'S EMERGENCY MOTION TO CONVERT TO CHAPTER 11**

Creditor and Interested Party Dustin Etter files this Response to Debtor's Emergency Motion to Convert to Chapter 11 (Doc. 13). Mr. Etter is opposed to the Motion to Convert.

1. Mr. Etter, directly and derivatively on behalf of Alliance Energy Partners, LLC, is by far Debtor's largest creditor and perhaps Debtor's only creditor of any consequence. Therefore, in some ways, Mr. Etter arguably stands to benefit the most if the Honea Egypt property is taken (back) by Alliance Farm and Ranch, LLC because it would leave funds to satisfy Mr. Etter's claim against Alliance Farm and Ranch, LLC. However, Mr. Etter opposes conversion because: (a) there does not appear to be any viable way to get the Honea Egypt property back into Debtor's ownership, (b) Debtor has not prosecuted this case in good faith, and (c) Debtor essentially exists to serve as a tool to enable Debtor's owner Jerod Furr to misappropriate funds from Mr. Etter and Alliance Energy Partners, LLC of which Mr. Etter is a 50% owner, so it would be inequitable to convert this case to Chapter 11 and put Mr. Furr, rather than an independent trustee, in control of the business.

Respectfully submitted,

IRELAN MCDANIEL, PLLC

By: /s/ Noah Meek

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**ATTORNEYS FOR CREDITOR  
DUSTIN ETTER**

**CERTIFICATE OF SERVICE**

This is to certify that on March 19, 2025, a true and correct copy of this instrument was served upon all parties **VIA the Court's CM/ECF System** in compliance with the Federal Rules of Bankruptcy Procedure.

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/s/ Noah Meek

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